

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK

SYNTEL STERLING BEST SHORES MAURITIUS  
LIMITED, and SYNTEL, INC.,

Plaintiffs and Counterclaim-Defendants,

v.

THE TRIZETTO GROUP, INC.  
and COGNIZANT TECHNOLOGY SOLUTIONS  
CORP.,

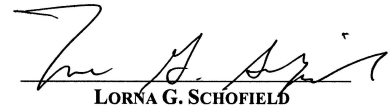
Defendants and Counterclaim-Plaintiffs.

1:15-CV-00211 (LGS) (SDA)

Hon. Lorna G. Schofield

So Ordered.

Dated: December 18, 2023  
New York, New York



LORNA G. SCHOFIELD  
UNITED STATES DISTRICT JUDGE

**JOINT STIPULATION**

This stipulation (the “Stipulation”) is entered into as of December 15, 2023, by Plaintiffs/Counterclaim-Defendants Syntel Sterling Best Shores Mauritius Limited and Syntel, Inc. (together, “Syntel”) and Defendants/Counterclaim-Plaintiffs The TriZetto Group, Inc. and Cognizant Technology Solutions Corp. (together, “TriZetto,” and with Syntel, the “Parties”), by and through their undersigned counsel.

**RECITALS**

**WHEREAS**, on October 27, 2020, the jury in the above-captioned matter (the “Action”) returned a verdict in TriZetto’s favor in the amount of \$284,855,192.00 in compensatory damages and \$569,710,834.00 in punitive damages (D.I. 931);

**WHEREAS**, on April 20, 2021, the Court reduced the punitive damages award to \$284,855,192.00 (D.I. 977);

**WHEREAS**, on May 18, 2021, the Court entered judgment in TriZetto’s favor in the cumulative amount of \$570,710,384.00 (D.I. 994);

**WHEREAS**, on May 26, 2021, Syntel appealed the judgment to the United States Court of Appeals for the Second Circuit (D.I. 995);

**WHEREAS**, on May 26, 2021, pursuant to Federal Rule of Civil Procedure 62(b), Syntel submitted a proposed supersedeas bond to this Court in the amount of \$570,710,384.00 (D.I. 998-1) (the “Bond”) and requested that the Court stay execution of its judgment;

**WHEREAS**, on June 3, 2021, the Court granted Syntel’s request for approval of the Bond and stayed execution of its judgment pending the outcome of Syntel’s appeal (D.I. 1003);

**WHEREAS**, on May 25, 2023, the Second Circuit affirmed the Court’s liability judgment, but vacated its damages judgment, and remanded to this Court for further proceedings (D.I. 1093);

**WHEREAS**, the Parties have submitted briefs regarding the appropriate amount of damages to be awarded in this case (*see* D.I. 1098, D.I. 1099, D.I. 1108, D.I. 1109, and D.I. 1121);

**WHEREAS**, the Parties have diverging views concerning whether a bond is appropriate and what the appropriate bond amount should be prior to the Court’s resolution of the parties’ briefing but, to avoid burdening the Court with a potential dispute, have reached a proposed compromise concerning the appropriate amount of an ongoing bond ;

**IT IS THEREFORE STIPULATED AND AGREED** by the Parties, through their undersigned counsel, subject to the approval of the Court, that:

1. Pursuant to a letter agreement dated November 30, 2023, Syntel has secured a bond in an amount agreed-to by the parties (the “Revised Bond”).
2. The Revised Bond shall be immediately effective.

3. This Stipulation is entered without prejudice to any Parties' rights or positions in the Action, whether at law or in equity.

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*\* with consent*